

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re) Case No. 04-37154-elp11
)
ROMAN CATHOLIC ARCHBISHOP) RULE 2014 VERIFIED STATEMENT
OF PORTLAND IN OREGON, AND) FOR PROPOSED PROFESSIONAL
SUCCESSORS, A CORPORATION) (JON ROBERT CONTE)
SOLE, dba the ARCHDIOCESE OF)
PORTLAND IN OREGON,)
Debtor.)
_____)

CLERK U.S. BANKRUPTCY COURT

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1. The applicant is not a creditor of the debtor except:
None.
2. The applicant is not an equity security holder of the debtor.
3. The applicant is not a relative of the individual debtor.
4. The applicant is not a relative of a general partner of the debtor (whether the debtor is an individual, corporation, or partnership).
5. The applicant is not a partnership in which the debtor (as an individual, corporation, or partnership) is a general partner.
6. The applicant is not a general partner of the debtor (whether debtor is an individual, corporation, or partnership).
7. The applicant is not a corporation of which the debtor is a director, officer, or person in control.
8. The applicant is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of the debtor.
9. The applicant is not a person in control of the debtor.
10. The applicant is not a relative of a director, officer or person in control of the debtor.
11. The applicant is not the managing agent of the debtor.
12. The applicant is not and was not an investment banker for any outstanding security of the debtor; has not been, within three years before the date of the filing of the petition, an investment banker for a security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor; and is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of such an investment banker.
13. The applicant has read 11 U.S.C. § 101(14) and § 327, and FRBP 2014(a); and the applicant has no connections with the debtor(s), creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, or any District of Oregon Bankruptcy Judge, except as follows. **Applicant has been and is engaged as an expert by certain tort claimants or their counsel.**
14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.

15. Describe details of all payments made to you by either the debtor or a third party for any services rendered on the debtor's behalf within a year prior to filing of this case:

None.

16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:

Based solely on information contained in pleadings filed in this case, it appears that the following Oregon non-profit corporations may be "affiliates" of Debtor as defined by 11 U.S.C. § 101(2):

Catholic Charities

Members: There are seven members: the Archbishop (in his individually capacity); three lay people and three clergy. Members are appointed by the Archbishop (in his individual capacity), but only a majority of all Members can remove a Member.

Directors: The directors consist of (1) each Member; (2) the chair of the board of each member agency of Catholic Charities; and (3) 29 elected directors, elected by the Members.

Operations: The Archbishop is not involved in the day-to-day operations of the corporation.

Oregon Catholic Press

Members: None.

Directors: From five to 12, all appointed by the President/Publisher in Chief, who is the Archbishop (in his individual capacity).

Operations: The Archbishop is not involved in the day-to-day operations of the corporation.

St. Mary's Home

Members: One Member, the Debtor as corporation sole.

Directors: The Member appoints 25% of the Directors, and the Board of Directors elects the remaining Directors.

Operations: The Member has certain underlying authority, but is not involved in the day-to-day operations of the corporation.

Village Enterprises

Members: One Member, the Debtor as corporation sole.

Directors: From three to 13, all appointed by the Member. The Board of Directors presents a list of nominees to the Member, who elects from this list or from others not on the list.

Operations: The Member has certain underlying authority, but is not involved in the day-to-day operations of the corporation.

17. The applicant is not an affiliate of the debtor.

18. Assuming any affiliate of the debtor is the debtor for purposes of statements 4-12, the statements continue to be true except (list all circumstances under which proposed counsel or counsel's law firm has represented any affiliate during the past 18 months; any position other than legal counsel which proposed counsel holds in

either the affiliate, including corporate officer, director, or employee; and any amount owed by the affiliate to proposed counsel or its law firm at the time of filing, and amounts paid within 18 months before filing):

None.

19. The applicant hereby acknowledges that he/she has a duty during the progress of the case to keep the court informed of any change in the statement of facts which appear in this verified statement. In the event that any such changes occur, the applicant immediately shall file with the court a pleading to which the original verified statement filed with the court is attached and which describes, by statement paragraph, those changes which have occurred.

THE FOLLOWING QUESTIONS NEED BE ANSWERED ONLY IF AFFILIATES HAVE BEEN LISTED IN STATEMENT 16.

20. List the name of any affiliate which has ever filed bankruptcy, the filing date, and court where filed:

Applicant has no knowledge or information upon which to base a response to this question.

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months.

Applicant has no knowledge or information upon which to base a response to this question.

22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:

Applicant has no knowledge or information upon which to base a response to this question.

23. List any security interest in any property granted by the debtor to secure any debts of any affiliate not covered in statements 19 and 20. List any security interest in any property granted by the affiliate to secure any debts of the debtor not covered in statements 20 and 21. Also include the collateral, the date and nature of the security interest, the name of the creditor to whom it was granted, and the current balance of the underlying debt:

Applicant has no knowledge or information upon which to base a response to this question.

24. List the name of any affiliate who is potentially a "responsible party" for unpaid taxes of the debtor under 26 U.S.C. §6672:

Applicant has no knowledge or information upon which to base a response to this question.

I verify that the above statements are true to the extent of my present knowledge and belief.


JON ROBERT CONTE

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